

ORIGINAL

Bell Atlantic  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

Donald C. Brittingham  
Director - Wireless Matters  
Government Relations  
202-336-7873

FX PARTE OR LATE FILED



September 8, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW  
Room: TW-A325  
Washington, DC 20554

RECEIVED

SEP 08 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 98-205

Dear Ms. Salas:

Today, the attached e-mail correspondence and attachment was sent to Kathy Brown, Chief of Staff to Chairman Kennard, regarding the Commission's review of its spectrum aggregation limits. Please include a copy of this ex parte communication in the record for the above captioned proceeding. If you have any questions, you may call me on (202) 336-7873.

A handwritten signature in cursive script, appearing to read "Dan Brittingham".

Attachment

No. of Copies rec'd  
List ABCDE

041



Donald Brittingham  
09/08/99 04:49 PM

To: kbrown@fcc.gov  
cc:  
Subject: WT Docket 98-205

----- Forwarded by Donald Brittingham on 09/08/99 04:49 PM -----



Donald Brittingham  
09/08/99 04:45 PM

To: kbrown@fcc.gov  
cc:  
Subject: WT Docket 98-205

I'm sorry we were unable to hook up today, and I fear we may miss each other before the sunshine on WT 98-205. I hope this brief e-mail adequately conveys Bell Atlantic's concerns about the pending action in the Spectrum Cap proceeding.

Bell Atlantic urges the Commission to grant immediate relief from the 45 MHz CMRS spectrum aggregation limit. The current limit will have a very real and serious effect on Bell Atlantic Mobile's ability to deliver wireless services in the future. Based on our current projections, our spectrum needs in some markets will exceed 45 MHz sometime in the year 2003. Given the 3 year planning cycle required to acquire new spectrum and buildout systems, a wait-and-see approach by the Commission is not at all helpful.

BAM has seen enormous growth on its cellular networks in the past several years. While subscribership continues to grow at a healthy pace, network usage has doubled year-over-year for the past two years. Our customers are using wireless services more than ever before. As we focus on wireless data and landline substitution offerings in the future, we will see even greater pressure on our spectrum capacity.

BAM's ability to satisfy future demand under the spectrum cap is constrained by the large base of analog customers it must continue to serve. Even as customers migrate to digital service, this embedded base of analog customers is expected to remain large for the foreseeable future. Moreover, cellular carriers are required to serve analog customers under the Commission's rules -- a requirement that does not extend to PCS operators. This "analog penalty" accelerates the cellular carrier's need for additional spectrum in advance of the needs of most PCS operators. The Commission should provide immediate relief from the spectrum cap to promote wireless-landline competition and the availability of future data services, including 3G.

Thanks for your consideration.

Don Brittingham  
Director - Bell Atlantic  
202-336-7873



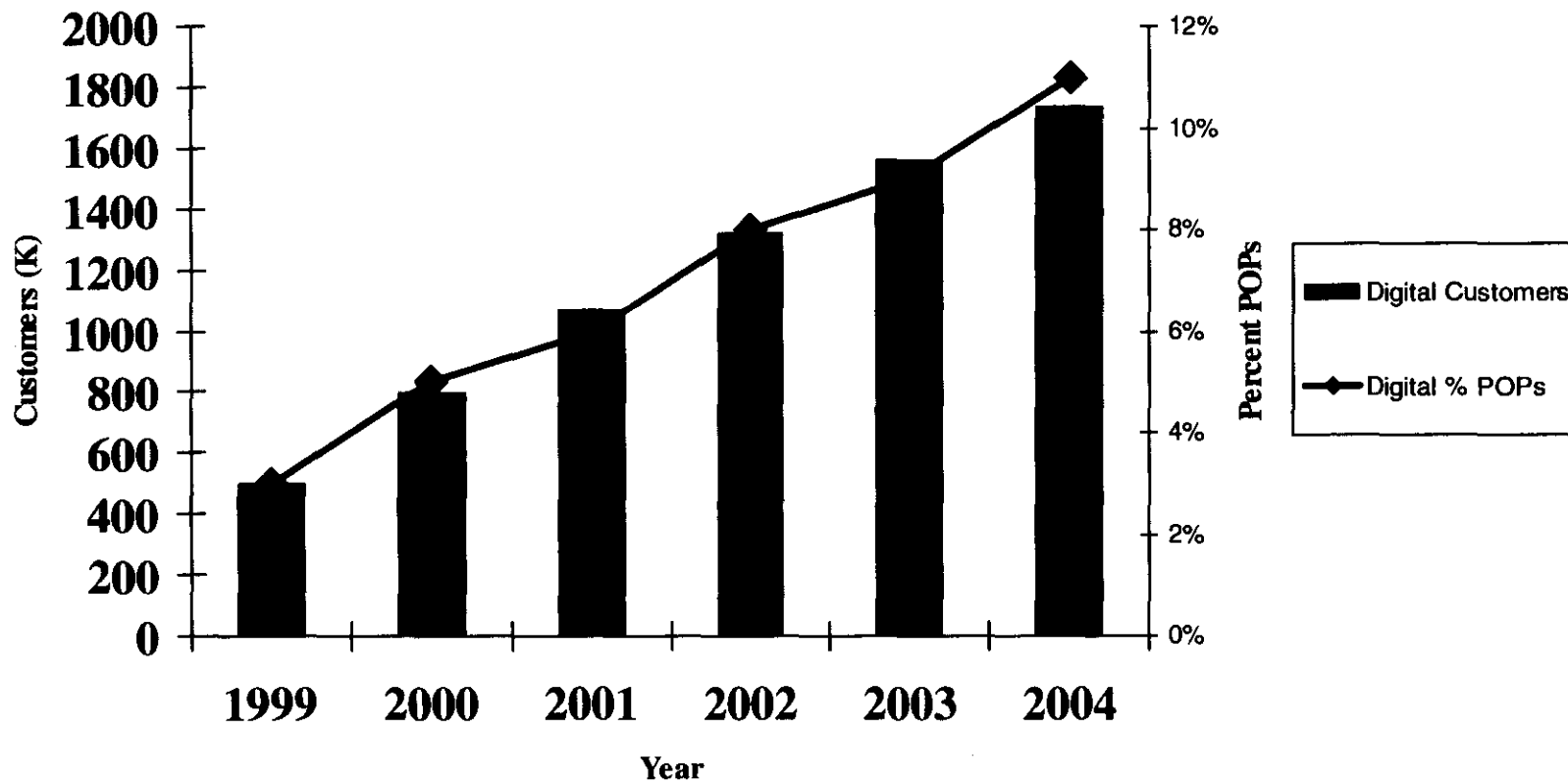
fcc slides.ppt

# 45MHz Spectrum Cap

- Cellular License, 25 MHz of Spectrum
  - Analog + CDPD
  - 6 CDMA carriers
- Two 10 MHz PCS Licenses
  - 3 CDMA carriers in each 10 MHz of PCS Spectrum
- 45 MHz limits the service provider to 12 CDMA carriers

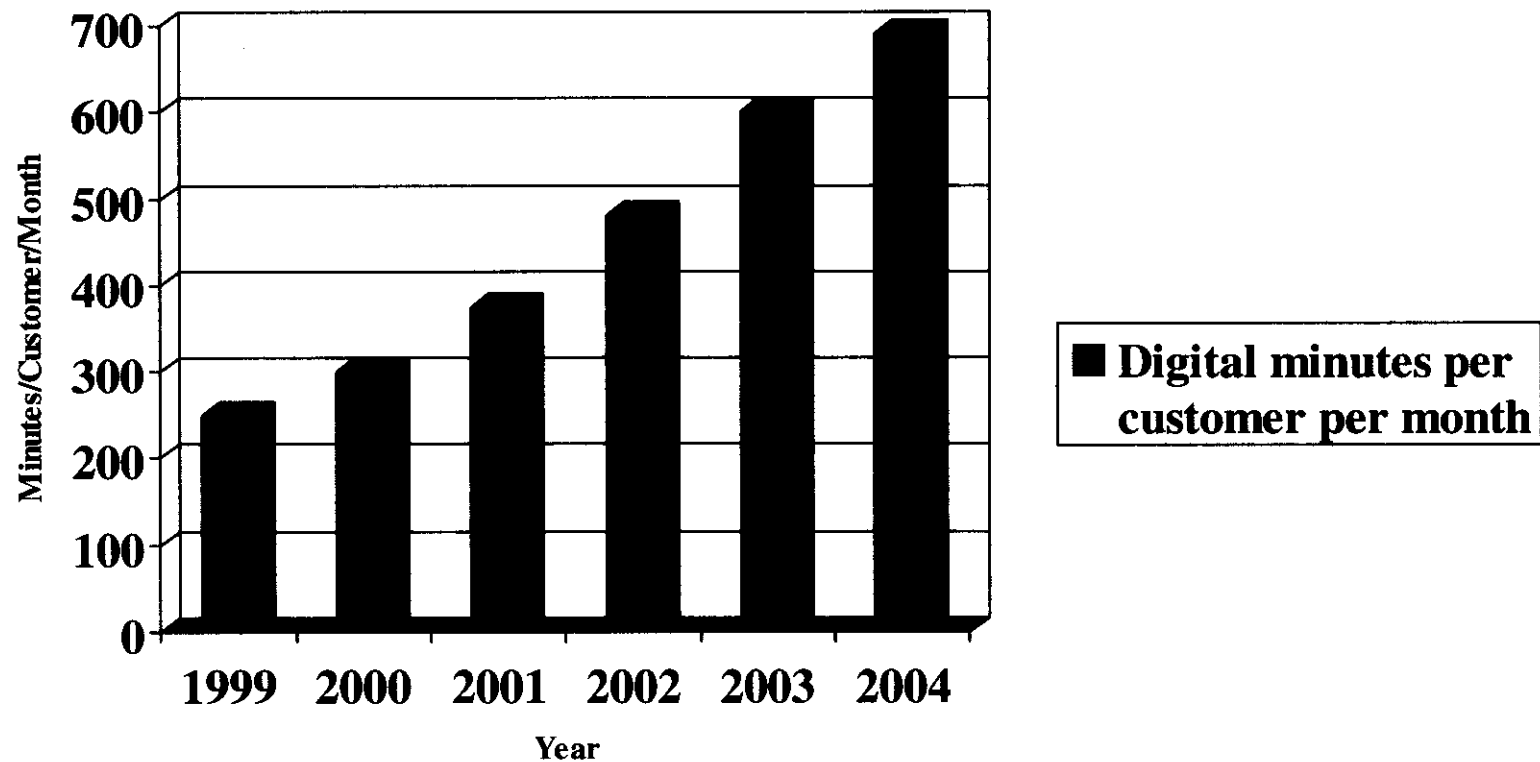
*The information contained in this report is based on estimates for a typical market.*

# Typical City - Projected Customer Growth



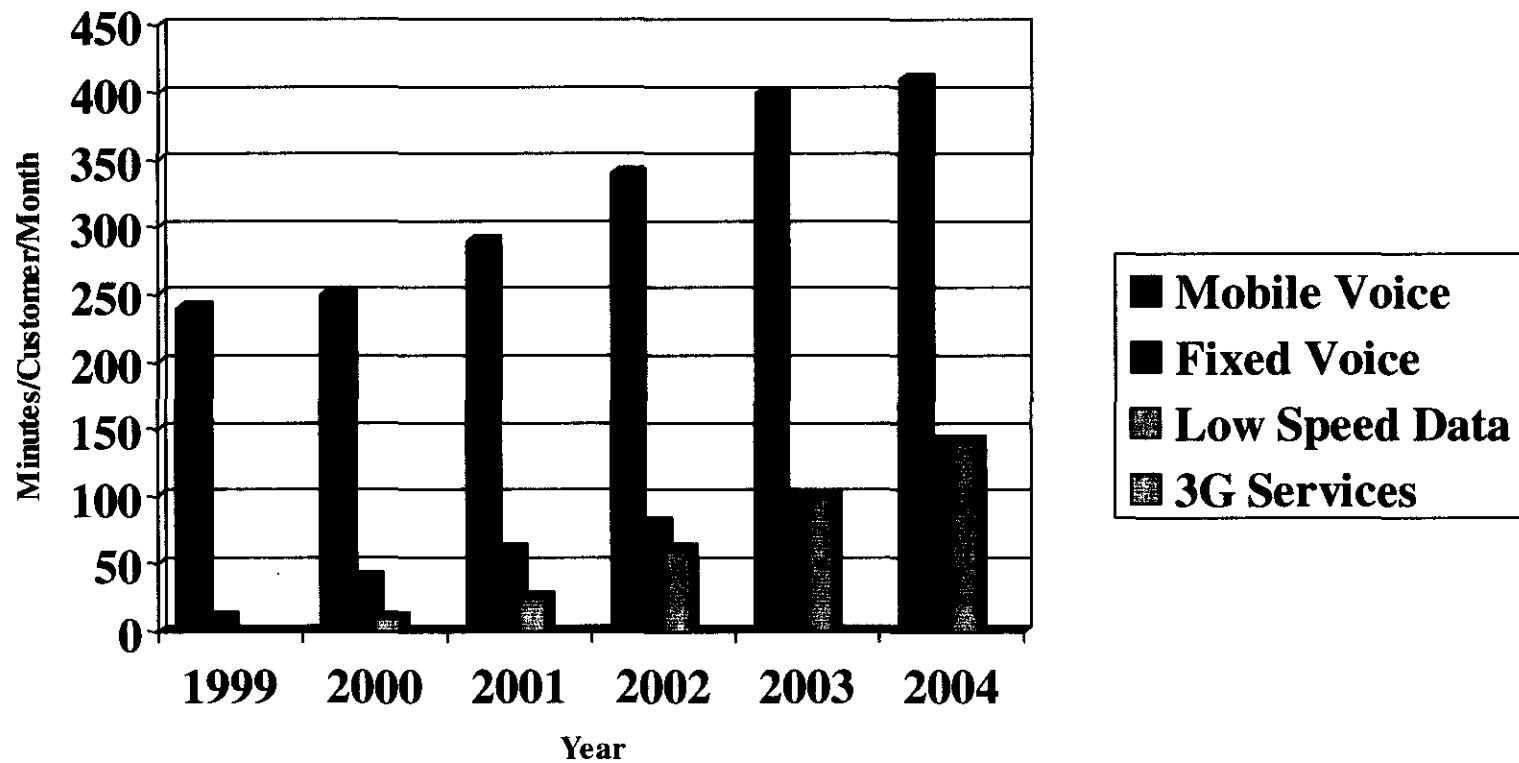
*The information contained in this report is based on estimates for a typical market.*

# Typical City - Projected Minutes/Customer



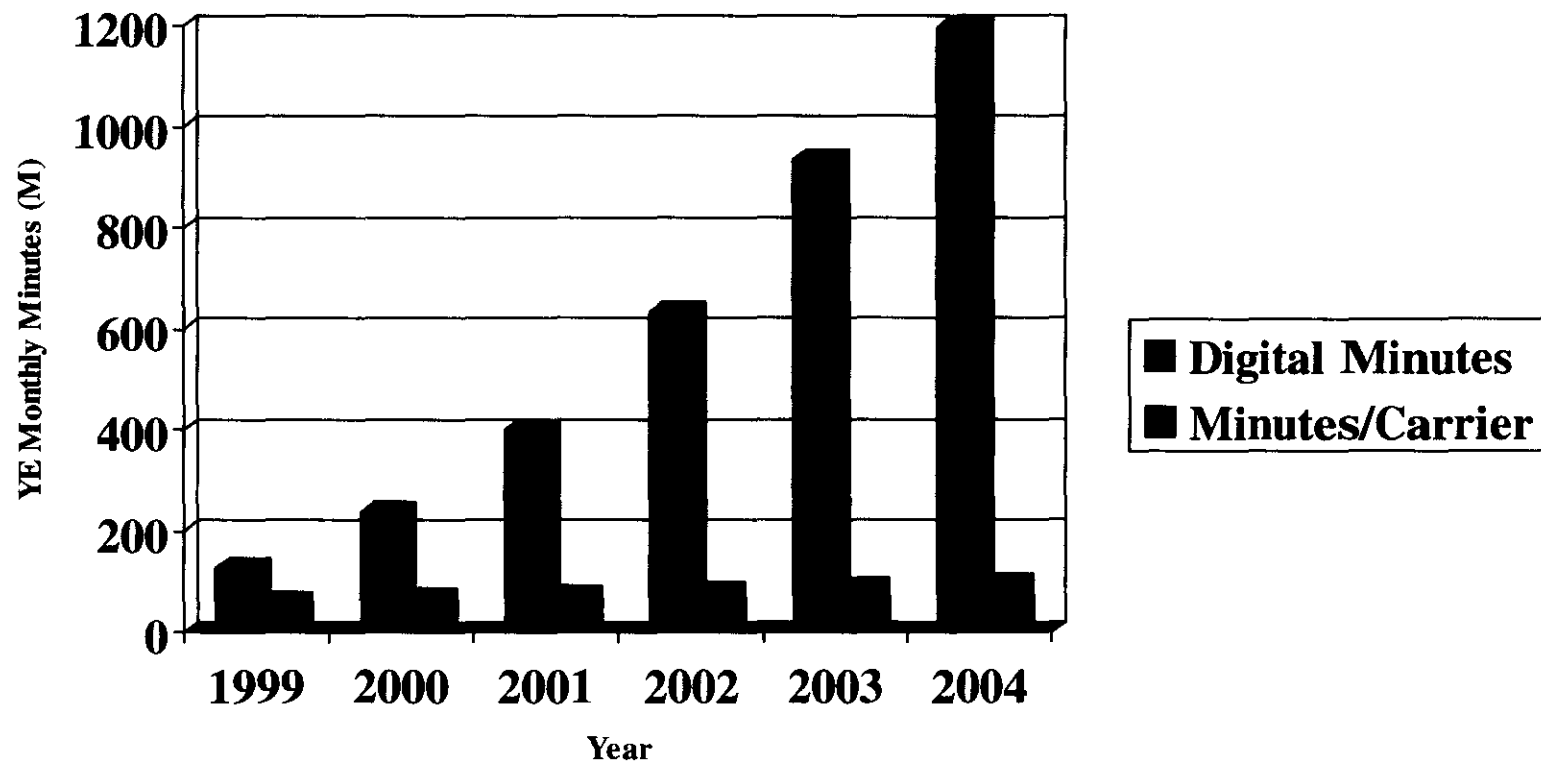
*The information contained in this report is based on estimates for a typical market.*

# Break Down of Projected Minutes/Customer



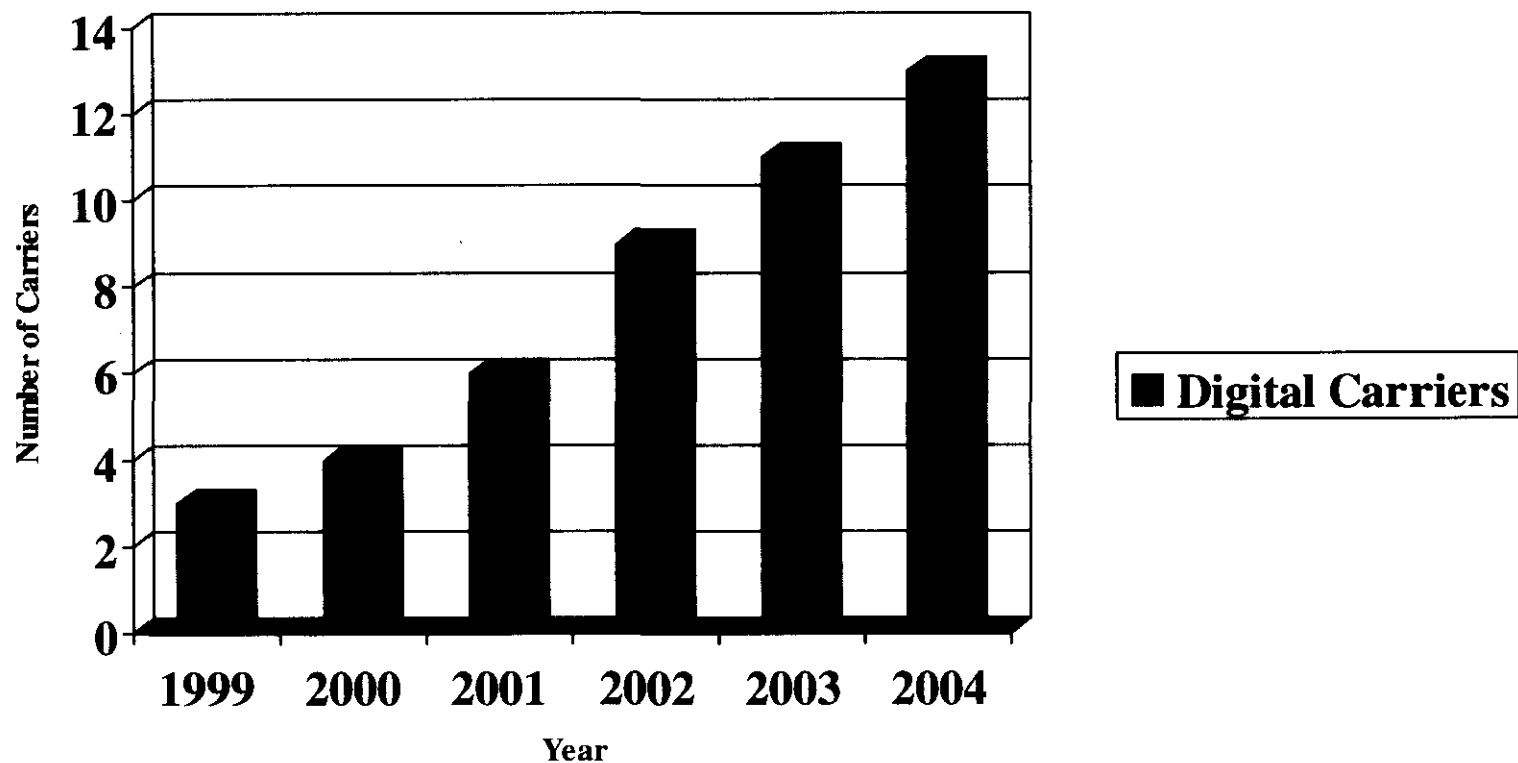
*The information contained in this report is based on estimates for a typical market.*

# Typical City - Total Projected Digital Minutes



*The information contained in this report is based on estimates for a typical market.*

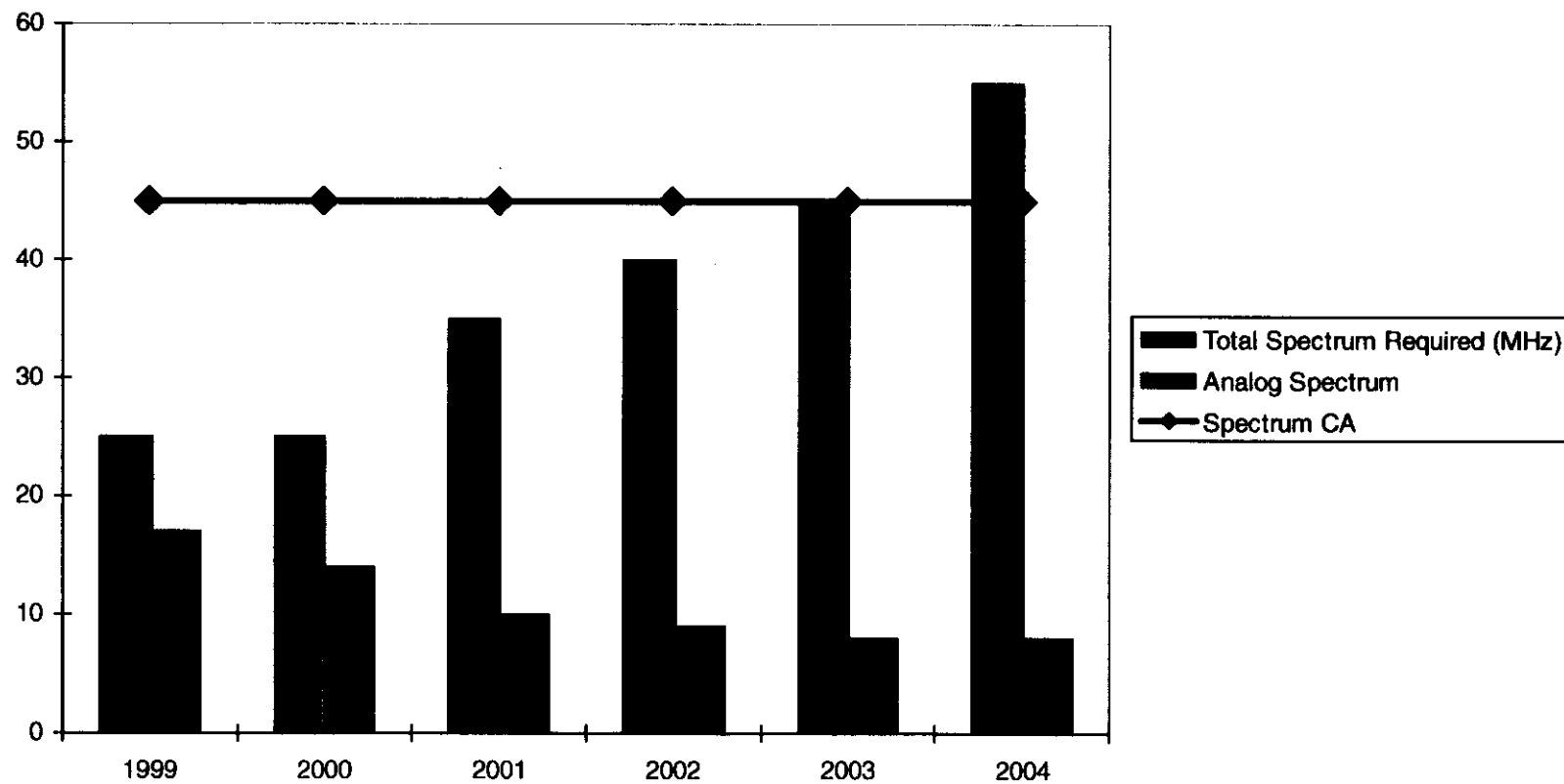
# Typical City - Digital Carriers Required



*The information contained in this report is based on estimates for a typical market.*



# Typical City - Spectrum Required



*The information contained in this report is based on estimates for a typical market.*

# Conclusions

- Spectrum caps do not provide carriers with the ability to satisfy the demand for wireless services.
  - Wireless local loop/land line displacement
  - High volumes of low speed data
  - High speed data
  - 3G services